

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
Plaintiff)	
)	
v.)	Civil No.: 25-CV-XXXXXX-XX
)	
7.23918814 BTC AND OTHER VARIOUS)	
CRYPTOCURRENCY SEIZED FROM)	
BINANCE ACCOUNT ASSOCIATED)	
WITH USER ID XXXXX3280 ON)	
OCTOBER 25, 2024)	
Defendant <i>in Rem</i> .)	

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The United States of America, by its attorney, Leah B. Foley, United States Attorney for the District of Massachusetts, in a civil action for forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), alleges that:

1. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1355, and venue is appropriate pursuant to 28 U.S.C. § 1395, because acts and omissions giving rise to the forfeiture occurred in the District of Massachusetts.

2. The Defendant Property consists of the following:

- a. 7.23918814 BTC¹, 105.75351403 ETH², 636.11899592 AVAX³, 14120.995091 USDT⁴, 2,380,467,906.17 SHIB⁵, and 319008151.01 PEPE⁶ seized from a Binance account associated with User ID XXXXX3280, on or about October 25, 2024 (collectively, the “Defendant Property”).

¹ “BTC” is the abbreviation for Bitcoin, a blockchain-based cryptocurrency with its value to dollar fluctuating with the market.

² “ETH” is the abbreviation for Ethereum, a blockchain-based cryptocurrency with its value to dollar fluctuating with the market.

³ “AVAX” is the abbreviation for Avalanche, a form of cryptocurrency.

⁴ “USDT” is the abbreviation for Tether, a form of cryptocurrency whose tokens operate as a stablecoin, indicating that each token is equivalent in value to one U.S. dollar.

⁵ “SHIB” is the abbreviation for Shiba Inu, a form of cryptocurrency.

⁶ “PEPE” is memecoin, a form of cryptocurrency.

3. As detailed in the Affidavit of Katrina P. Caulfield, Special Agent with the United States Secret Service, attached hereto as Exhibit A and incorporated herein by reference, the United States has probable cause to believe that the Defendant Property is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) because it represents property, real or personal, which constitutes or is derived from proceeds traceable to a violation of a specified unlawful activity, specifically violations of 18 U.S.C. § 1343 (Wire Fraud). There is also probable cause to believe that the Defendant Property is subject to forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) because it represents property, real or personal, involved in a transaction or attempted transaction, specifically violations of 18 U.S.C. § 1956(a)(1)(B)(i) and (h) (money laundering and conspiracy to commit money laundering) or property traceable to such property.

WHEREFORE, the United States of America requests:

1. That a Warrant and Monition, in the form submitted herewith, be issued to the United States Secret Service, or designee, commanding seizure of the Defendant Property, and to give notice to all interested parties to appear and show cause why the forfeiture should not be decreed;
2. That judgment of forfeiture be decreed against the Defendant Property;
3. That thereafter, the Defendant Property be disposed of according to law; and
4. For costs and all other relief to which the United States may be entitled.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

By: /s/ Carol E. Head
CAROL E. HEAD
Assistant United States Attorney
U.S. Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100
carol.head@usdoj.gov

Dated: February 19, 2025

Verification

I, Katrina P. Caulfield, Special Agent for the United States Secret Service, state that I have read the foregoing Verified Complaint for Forfeiture *in Rem*, and the Affidavit, attached as Exhibit A, and declare under penalty of perjury that the contents thereof are true to the best of my knowledge, information, and belief.

A handwritten signature in blue ink, appearing to read 'K. P. Caulfield', is written over a horizontal line.

Katrina P. Caulfield
Special Agent
United States Secret Service

Dated: February 16, 2025